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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRICIA J. RITCHIE,

Plaintiff,

– against –

NORTHERN LEASING SYSTEMS, INC., LEASE
FINANCE GROUP, LLC, RICARDO BROWN, ROBERT
TAYLOR, JOSEPH I. SUSSMAN, JOSEPH I.
SUSSMAN, P.C., AND JAY COHEN,

Defendants.

12 Civ. 4992 (KBF)

**DECLARATION OF
ROBERT D. LILLIENSTEIN
IN SUPPORT OF
DEFENDANTS' MOTION
FOR SANCTIONS
PURSUANT TO 28 U.S.C.
§1927**

I, ROBERT D. LILLIENSTEIN, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct under penalty of perjury:

1. I am an attorney with Moses & Singer LLP, attorneys for Defendants Northern Leasing Systems, Inc. ("Northern"), Lease Finance Group, LLC ("LFG"), Ricardo Brown, Robert Taylor, Joseph I. Sussman, Joseph I. Sussman, P.C., and Jay Cohen. I have been personally involved in representing the Defendants throughout this action. As such I have personal knowledge of the facts set forth below.

2. I submit this declaration in support of Defendants' motion for sanctions, pursuant to 28 U.S.C. §1927 and the Court's inherent powers, against the attorneys of record for Plaintiff, Patricia J. Ritchie, Krishnan Chittur and Chittur & Associates, P.C. ("Counsel"), based on the their unreasonable and vexatious conduct that has unquestionably multiplied proceedings in this case.

3. Submitted herewith as Exhibit A is a true copy of the deposition of Patricia Ritchie, taken July 30, 2015.

4. Submitted herewith as Exhibit B is a true copy of the Decision and Order of the Supreme Court, New York County, dated March 21, 2016, in the action entitled *Aldrich v. Northern Leasing Systems, Inc.*, Index No. 602803/2007 (Sup. Ct. N.Y. Cty. Mar. 21, 2016).

5. Defendants are prepared to present evidence of the amount of attorneys' fees and litigation expenses that they incurred as a result of Plaintiff's counsel's unreasonable and vexatious multiplication of proceedings in this case.

Dated: New York, New York
September 4, 2017

/s/
ROBERT D. LILLIENSTEIN